

August 2011 Update

Broderick Wood Products Superfund Site

Denver, Colorado
(Review Date: 9/25/2006)

Issues & Recommendations Update

Issues	Recommendations/ Follow-up Actions	Status or Due Date	Status of Follow-up Actions (August 2011)	Responsible Party
1. In 2005, the Package Water Treatment System (PWTS) had a utilization rate of only 70%. Increasing the utilization rate of the PWTS would shorten the time required for long-term groundwater remediation.	This may be facilitated by improved planning for granular activated carbon replacement and by a preventative maintenance and inspection program to assist in identifying and repairing/replacing equipment or piping that may be near failure before shutting down the PWTS is necessary.	9/30/11	ONGOING: BIC claims to be in dire financial straits and has postponed implementation of this recommendation until further notice.	BIC
2. For the former impoundment area, effective/efficient water management procedures to maximize Light Nonaqueous Phase Liquids (LNAPL) recovery have not been developed, documented nor utilized.	From this point forward, dewatering and re-injection rates should be recorded on a monthly basis to evaluate their effectiveness in recovering LNAPL. Trench well points water and LNAPL level measurements should be evaluated regularly to determine if a series of mounds and depressions have been established.	9/30/11	ONGOING: BIC claims to be in dire financial straits and has postponed implementation of this recommendation until further notice.	BIC
3. With the completion of soil treatment, the LTU's have not been capped, closed and maintained in accordance with the OU2 ROD and RCRA ARARs.	The LTUs will need to be capped, closed and maintained in accordance with the OU2 ROD and RCRA ARARs.	9/30/11	ONGOING: EPA, CDPHE and BIC have not come to agreement on appropriate closure procedures for the LTUs in the context of future development at the site.	BIC
4. The performance monitoring scheme for the West SBCW is currently inadequate and will need to be reevaluated.	A well will need to be installed in the drainage ditch west of the West SBCW and be included in the groundwater monitoring program for the site. If there is little or no groundwater leakage under or through the West SBCW, contaminant concentrations should show a downward trend over time.	9/30/08	CONSIDERED AND NOT IMPLEMENTED: EPA agreed with BIC that there was no need to implement this recommendation in a letter dated 9/30/08.	BIC

5. Contamination in the former catchment area, west of the West SBCW, is recurrent and will need to be reevaluated.	The former catchment area and the West SBCW should be closely monitored for two years to accumulate enough data to adequately evaluate the contamination in the immediate area and the performance of the West SBCW. The former catchment area should be sampled on a semi-annual basis with the addition of a new well.	9/30/08	CONSIDERED AND NOT IMPLEMENTED: EPA agreed with BIC that there was no need to implement this recommendation in letter dated 9/30/08.	BIC
6. Fisher Ditch water has not been sampled since the 2001 Report. Monitoring results are not available to indicate contaminant levels in the ditch and if the existing ARARs are being met.	Fisher Ditch will need to be sampled. Work and sampling plans will need to be developed prior to sampling. If the results do not meet the existing ARARs, a further evaluation will need to be conducted to determine if the results fall within the acceptable risk range.	9/30/11	COMPLETED: BIC sampled in 2008 at three locations; all results were non-detect.	BIC
7. The potential pathway from groundwater (and soils) to indoor air has never been evaluated.	The indoor air pathway should be evaluated given the presence of benzene, toluene, ethyl benzene, and xylene (BTEX) and chlorinated volatile organic compounds at the site.	9/30/06	COMPLETED: The owner of the developmental area of the site was notified in September 2006 that soil gas sampling will be needed prior to construction of any new buildings.	Scott Contracting
8. BIC's contour map in the 2006 O&M report may not accurately reflect the potentiometric surface of the surficial aquifer.	A better and more appropriate contouring program for the surficial aquifer will be needed.	9/30/11	COMPLETED: The contour map for the fourth quarter of 2008 was satisfactory.	BIC
9. The O&M Plan and reports do not accurately reflect current conditions especially given recent remedy modifications.	The O&M Plan needs to be thoroughly revised to accurately/effectively reflect current conditions. In turn, the format and content of subsequent O&M Reports will need to be revised to reflect the updated O&M Plan.	9/30/11	ONGOING: BIC claims to be in dire financial straits and has postponed implementation of this recommendation until further notice.	BIC
10. Since the 2001 report, an updated survey of potential off-site users of well water has not been conducted.	The survey will need to be conducted under an approved work plan.	9/30/08	CONSIDERED AND NOT IMPLEMENTED: EPA agreed with BIC that there was no need to implement this recommendation in a letter dated 9/30/08.	BIC